

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL LEAGUE
PLAYERS' CONCUSSION INJURY LITIGATION

Kevin Turner and Shawn Wooden, on behalf of
themselves and others similarly situated,

Plaintiffs

v.

National Football League and NFL Properties, LLC,
successor-in-interest to NFL Properties, Inc.,

Defendants.

No. 2:12-md-02323-AB
MDL No. 2323

THIS DOCUMENT RELATES TO:
ALL ACTIONS

**CONSENT MOTION TO ESTABLISH BRIEFING SCHEDULE FOR INTERVENORS'
COUNSEL'S MOTION FOR ATTORNEY'S FEES AND EXPENSES**

Under the settlement agreement to resolve race norming issues reached between Intervenor Kevin Henry and Najeh Davenport, the NFL Parties, and Class Counsel, "Intervenors' Counsel may file a motion for attorneys' fees and expenses to the Court, to which the NFL Parties reserve the right to object" and "the NFL Parties agree to pay . . . all fees and expenses that the Court approves[.]" Settlement Agreement § 11.3, ECF 11502. Intervenor's Counsel—with consent from the NFL Parties and Class Counsel—therefore respectfully requests that the Court set the following briefing schedule:

1. Intervenor's Counsel shall file any motion for attorney's fees and expenses no later than **April 1, 2022**.
2. Any opposition shall be filed no later than **May 4, 2022**.

3. Any reply shall be filed no later than **May 25, 2022**.

Dated: March 15, 2022

Respectfully submitted,

/s/ Cyril V. Smith
Cyril V. Smith
Zuckerman Spaeder LLP
100 E. Pratt Street, Suite 2440
Baltimore, MD 21202
(410) 332-0444
csmith@zuckerman.com

Aitan D. Goelman
Zuckerman Spaeder LLP
1800 M Street, 10th Floor
Washington, DC 20036
(202) 778-1800
agoelman@zuckerman.com
emarcus@zuckerman.com

/s/ Edward S. Stone
Edward S. Stone
Edward Stone Law P.C.
300 Park Avenue, 12th Floor
New York, NY 10022
(203) 504-8425
eddie@edwardstonelaw.com

/s/ J.R. Wyatt
J.R. Wyatt
JR Wyatt Law PLLC
49 West 37th Street, 7th Floor
New York, New York 10018
(215) 557-2776
justin@jrwyattlaw.com

Attorneys for Kevin Henry and Najeh Davenport

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing was filed electronically with the Clerk of the Court on March 15, 2022, to be served by operation of the Court's electronic filing system which sent notification of such filing via electronic mail to all counsel of record.

Dated: March 15, 2022

/s/ Cyril V. Smith
Cyril V. Smith